

## OSBORN LAW P.C.

Daniel A. Osborn, Esq.  
Lindsay M. Trust, Esq.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 5/6/2025

c.com  
c.com

# MEMO ENDORSED

May 5, 2025

Application GRANTED. No further extensions will be granted. SO ORDERED.



Barbara Moses  
United States Magistrate Judge  
May 6, 2025

VIA ECF

Honorable Barbara C. Moses  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Dade v. Commissioner of Social Security*  
Civil Action No. 1:24-cv-09123-BCM

Dear Judge Moses,

We write on behalf of our client, Norman J. Dade, with the consent of the defense, to request additional time to file his motion for judgment on the pleadings which is currently due today May 5, 2025 per the Court's February 2, 2025 Order Granting Extension of Time to File. This is the parties' second request for an extension. The reason for this request is the start of a bench trial before Judge Wicks on May 12, 2025 and the need to properly prepare for that trial.

After conferring with the defendant, the parties are amenable to proceeding according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file his motion for judgment on the pleadings on or before: **June 19, 2025**;
- Defendant to file its response to plaintiff's motion/cross motion on or before: **August 4, 2025**; and
- Plaintiff to file his reply, if any, on or before: **August 18, 2025**.

Honorable Barbara C. Moses  
May 5, 2025  
Page Two

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn  
Daniel A. Osborn  
OSBORN LAW, P.C.  
43 West 43rd Street, Suite 131  
New York, New York 10036  
Telephone: 212-725-9800  
Facsimile: 212-500-5115  
dosborn@osbornlawpc.com

cc: Kristina Danielle Cohn, Esq. (by ECF)